IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

| MICHAEL T. DREHER, Individually and on behalf of a class of similarly situated persons, |))) |
|---|--|
| Plaintiff, v. |)) Civil Action No. 3:11-CV-00624-JAG |
| EXPERIAN INFORMATION SOLUTIONS, INC., CARDWORKS, INC., and |))) |
| CARDWORKS SERVICING, LLC, Defendants. |))) |

EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Defendant Experian Information Solutions, Inc. ("Experian" or "Defendant"), pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule 56 of the Rules of the United States District Court for the Eastern District of Virginia, respectfully moves this Court for partial summary judgment on Plaintiff's Class Claims (Counts One, Two, and Three) as to the issue of willful noncompliance with the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681, et seq.

Experian provides the arguments in support of this motion for partial summary judgment in the accompanying memorandum.

Dated: October 5, 2012 Respectfully submitted,

/s/ Joseph W. Clark

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Counsel for Defendant Experian Information Solutions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of October, 2012, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing (NEF) to the following:

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Dated: October 5, 2012

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